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21 *Attorneys for Plaintiff*

22 **UNITED STATES DISTRICT COURT**

23 **DISTRICT OF NEVADA**

24 ADVANTA-STAR AUTOMOTIVE  
25 RESEARCH CORPORATION OF AMERICA,

26 Plaintiff,

27 v.

28 MADSEN HOLDINGS, LLC D/B/A MADSEN  
29 MARKETING & PR; TIGER MOTORS LV,  
30 INC. D/B/A INFINITI OF LAS VEGAS;  
31 INFINITI AND BEYOND, LLC D/B/A  
32 INFINITI OF NORTHERN KENTUCKY; and  
33 BRITTANY MADSEN, an individual,

34 Defendants.

35 CASE NO.: 2:21-cv-00026- RFB-BNW

36 **STIPULATION AND [PROPOSED]  
37 ORDER TO CONTINUE FEDERAL  
38 RULE 26(f) AND LOCAL RULE II 26-1  
39 DEADLINES**

40 **(First Request)**

41 Pursuant to LR IA 6-1, LR IA 6-2, and LR II 7-1, Plaintiff Advanta-STAR Automotive  
42 Research Corporation of America (“Advanta-STAR” or “Plaintiff”) and Defendants Madsen  
43 Holdings, LLC d/b/a Madsen Marketing & PR (“Madsen Holdings”), Brittany Madsen (“Ms.  
44 Madsen”), Tiger Motors LV, Inc. d/b/a Infiniti of Las Vegas (“Tiger Motors”) (collectively,  
45

1 “Defendants,” and with Plaintiff, the “Parties”) hereby stipulate, contingent upon this Court’s  
2 approval, to the following:

3 1. Pursuant to LR IA 6-1, this is the first stipulation for a continuance of time to hold  
4 the Fed. R. Civ. P. 26(f) and LR II 26-1 conference.

5 2. Plaintiff commenced this matter against Defendants on January 6, 2021. Tiger  
6 Motors was served with a copy of the Summons and Complaint on January 21, 2021. Ms. Madsen  
7 was served with a copy of the Summons and Complaint on February 7, 2021. Madsen Holdings  
8 and Plaintiff stipulated to Acceptance of Service on February 10, 2021 (ECF No. 14), and service  
9 of the Summons and Complaint is deemed effective as of February 7, 2021.

10 3. Tiger Motors filed its Answer to Plaintiff’s Complaint on February 5, 2021.

11 4. Ms. Madsen and Madsen Holdings filed their Answer to Plaintiff’s Complaint on  
12 March 5, 2021.

13 5. The Rule 26(f) and LR II 26-1 conference for Tiger Motors was initially set for March  
14 8, 2021, while the Rule 26(f) and LR II 26-1 conference for Ms. Madsen and Madsen Holdings  
15 was initially set for April 5, 2021.

16 6. Fed. R. Civ. P. 26(f) requires the Parties to confer as soon as practicable “and in  
17 any event at least 21 days before a scheduling conference is to be held or a scheduling order is  
18 due under Rule 16(b).” *See* Fed. R. Civ. P. 26(f)(1).

19 7. LR II 26-1 requires Plaintiff to “initiate the scheduling of the conference required  
20 by Fed. R. Civ. P. 26(f) . . . within 30 days after the first defendant answers or otherwise appears.”  
21 *See* LR II 26-1(a).

22 8. Fed. R. Civ. P. 26(f) and LR II 26-1 require that, within fourteen (14) days of the  
23 Rule 26(f) conference, the Parties provide the Court with a stipulated discovery plan and  
24 scheduling order, and exchange initial disclosures. Fed. R. Civ. P. 26(f)(2); LR II 26-1(a).

25 9. The Parties have agreed to conduct the Rule 26(f) conference on March 18, 2021.

26 10. The Parties have agreed to provide the Court with a stipulated discovery plan and  
27 scheduling order, and exchange initial disclosures, by no later than April 8, 2021, fourteen (14)  
28 days after the Rule 26(f) conference.

1       11. This stipulation and order is entered into between the Parties to promote efficiency  
2 and reduce unnecessary litigation efforts and expense, as it would otherwise be necessary for the  
3 Parties to conduct separate Rule 26(f) conferences.

4       12. This stipulation is sought in good faith and not for purposes of delay.

5       **IT IS SO STIPULATED.**

7       Dated this 15th day of March, 2021

8       **HOLLEY DRIGGS**

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7       Dated this 15th day of March, 2021

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Holdings, LLC and Brittany Madsen*

19      Dated this 15th day of March, 2021

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37      *Attorney for Defendant Tiger Motors  
LV, Inc., d/b/a Infiniti of Las Vegas*

38      **ORDER**

39      **IT IS SO ORDERED**

40      **DATED: 11:39 am, March 19, 2021**

41        
42      **BRENDA WEKSLER**  
43      **UNITED STATES MAGISTRATE JUDGE**

1 SUBMITTED BY:

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